



Health  
Canada

Santé  
Canada

Pest  
Management  
Regulatory  
Agency

Agence de  
réglementation  
de la lutte  
antiparasitaire

May 10, 2023

Sebastien Dutrisac  
Chair, Alberta Agricultural Service Board Provincial Committee  
[asbprovcommittee@gmail.com](mailto:asbprovcommittee@gmail.com)

Dear Sebastien Dutrisac:

Thank you for your correspondence of April 19, 2023, addressed to the Pest Management Regulatory Agency's Pest Management Information Service, requesting the emergency registration and use of strychnine in Canada to control Richardson's Ground Squirrels (RGS) for the 2023 season, as well as collaborative work to find a single feed alternative for strychnine. I appreciate your taking the time to send us a copy of a recent resolution passed by the Alberta Agricultural Service Board (ASB) Provincial Committee on this important topic.

Health Canada acknowledges the implications the cancellation of the pesticide product containing strychnine could have on agricultural producers in Alberta and Western Canada and takes them seriously.

As outlined in [Re-evaluation Decision RVD2020-06, Strychnine and Its Associated End-use Products \(Richardson's Ground Squirrels\)](#) published on March 4, 2020, Health Canada concluded that the environmental risks associated with the use of strychnine for the control of RGS were not shown to be acceptable when used according to label directions and that no further feasible mitigation measures could be implemented by users of the product. Consequently, the registration of products containing strychnine used to control RGS was cancelled and a 3-year phase-out period was allowed until March 4, 2023.

In its decision, Health Canada recognized the value of strychnine because it is easy to use, cost effective and manages RGS in a single feeding. However, there are other alternatives to strychnine registered to control RGS available to users: chlorphacinone, diphacinone, zinc phosphide, and aluminum phosphide. While these alternatives may have some limitations compared to strychnine, they were found to be efficacious against the target pest during the scientific review that led to their registration.

.../2

Canada

2 Constellation Drive Woodline Bldg. Nepean Ontario K1A 0K9

Under section 18 of the [Pest Control Products Regulations](#), the Minister of Health may register a pest control product or amend the registration of a pest control product to permit its use, for a period not exceeding one year, for the emergency control of seriously detrimental pest infestations. For information on emergency registrations, such as criteria and information requirements, please refer to Regulatory Directive DIR2017-03, *Registration of Pesticides for Emergency Use: Revised Procedures*. With respect to strychnine, an Emergency Use Registration is not an option as there are alternative products registered for the control of RGS and the environmental risks have been shown to not be acceptable. Emergency registrations are not a tool to be used to extend access to the use of a pest control product that has been cancelled. For known or ongoing pest problems where no registered product is available, the normal registration processes would apply to address such situations.

Efforts to identify new products and to conduct additional research into RGS control should involve grower groups, registrants of potential alternative products, Agriculture and Agri-Food Canada, and/or provincial representatives. Health Canada's Pest Management Regulatory Agency will continue to be available to provide information and guidance regarding the registration process, and information on currently registered products.

I hope this information is helpful in addressing your concerns.

Again, thank you for writing.

Sincerely,

2023-05-10

X 

---

Frédéric Bissonnette  
A/Executive Director, PMRA  
Signed by: Bissonnette, Frederic